

## STATE OF NEW YORK

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May 22, 2008

**SO ORDERED** 

**BY HAND** 

Honorable George B. Daniels United States District Judge United States District Court Southern District of New York 500 Pearl St., Room 630 New York, NY 10007

Re: Brown v. Goldstein, et. al., 08-CV-2207 (GBD)(AJP)

Dear Judge Daniels:

I am an Assistant Attorney General in the Office of Andrew M. Cuomo, Attorney General of the State of New York. I represent defendant Lori Beth Goldstein, M.D. and the New York State Department of Correctional Services ("DOCS"), who has been served and has requested representation. To date, the other named defendants, C.O. N. Davis and Sgt. Furness have not been served and have not requested representation from our office.

I respectfully write to request an extension of defendant DOCS's time to answer or otherwise move with respect to plaintiff's complaint from up to and including June 6, 2008. Dr. Goldstein's answer is currently due on June 6, 2008, and an extension of DOCS' time to answer would permit answers to be filed on behalf of both defendants at the same time. I have not sought the consent of the <u>pro se</u> plaintiff as she has recently been released from Bedford Hills Correctional Facility and her telephone number is not on file with the Pro Se Office or the Court. No previous requests for an extension of DOCS' time to answer or move has been made.

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By making such a request, we are not waiving any rights the defendants not yet served may have, including the right not to appear or the right to answer or move with respect to lack of personal jurisdiction.

Thank you for your consideration of this request.

Respectfully submitted,

nna Reznik

Assistant Attorney General

ce: Lyndira Brown (by first class mail) 168 East 107th Street -Apt# 4B New York, NY 10029